## Before the FEDERAL COMMUNICATIONS COMMISSION Washington DC 20554

In the Matter of	)	
	)	
Sprint Communications Company L.P.	)	WC Docket No. 08-116
Section 63.71 Application for the	)	Comp Pol. File No. 871
Discontinuance of 900 Transport Service	)	
	)	

## Additional Comments of Network Telephone Services Inc.

Network Telephone Services Inc. (NTS) submits these additional comments to the Federal Communications Commission (FCC) in connection with the pending Section 63.71 proceeding in which Sprint Communications Company, L.P. (Sprint) has applied to discontinue their Transport 900 services to their current customers. NTS is a current customer of Sprint's 900 transport services.

As of today's date NTS has not received notice that the FCC has granted Sprint permission to discontinue its Transport 900 services to Sprint's current customers. However, Sprint now appears to be moving ahead on its own by raising their customer's charges for its 900 transport product so high that it will be impossible for these remaining customers to afford to continue paying for Sprint's 900 transport service.

Attached with these comments is the letter faxed to NTS this past Monday evening (November 24, 2008) by Sprint's counsel. The letter identifies that Sprint is unilaterally modifying the terms of its 900 Transport Agreement effective as of January 1, 2009.

The fee increases presented in the attached letter are so extreme that they look as if these are priced to get rid of Sprint's remaining 900 service customers. As an example, Sprint introduces a new charge for a monthly "Maintenance Fee" of \$10,000. For more than fifteen years, Sprint has not charged NTS any Maintenance Fee for 900 transport services. The other new charges are large increases across the board. This pricing appears punitive to the remaining customers of Sprint's 900 transport services. Language is even inserted in this proposed new pricing from Sprint warning that "...none of the fees are subject to waiver" and "a security deposit may be required." This threatens Sprint customers with their staying on instead of being fair or remotely reasonable.

NTS has gone on record with its comments to the FCC requesting a reasonable transition period before Sprint is able to terminate their longtime 900 transport customer relationships. This is reasonable because Sprint has the exclusive control of the operation and the transport servicing of their customer's 900-NXX telephone exchanges. This is also fair in order to give Sprint's 900 customers time to promote alternative telephone programs so consumers will be made aware of telephone programs that will be available after Sprint exits the 900 transport business. The transition period proposal will be defeated by Sprint raising their 900 transport charges to such exorbitant levels.

NTS requests that the FCC take whatever action is reasonable to allow for the transition period to continue without these unnecessarily high charges being added on by Sprint during the timeframe. Sprint's action this week defeats the intent of the transition process.

If there are any questions or comments to this communication that require immediate attention, please feel free to contact the undersigned in this regard.

Very truly yours,

NETWORK TELEPHONE SERVICES INC.

Daniel H. Coleman Vice President

Legal & Business Affairs

21135 Erwin Street

Woodland Hills, CA 91367

(818) 227-1145

Submitted on November 26, 2008

Counsel KSOPHNOX14



Sprint Nextel (Law Department 6450 Sprintransway

November 24, 2008

Network Telephone Services, Inc. (1884) Accounts Payable Department 21135 Erwin Street Woodland Hills, CA 91367 Via Overnight Delivery

Re: Notification of modification of Exhibit A for transport 900 services, effective January 1, 2009

Dear Network Telephone Services, Inc. (1884):

Under Section VII.E. of the parties' 900 Transport Agreement, Sprint is giving 30 days' prior written notice that it is modifying Exhibit A. The modified Exhibit A is effective beginning January 1, 2009

## EXHIBIT A PRICING OPTIONS

GENERAL FEES		
Product Installation Fee (One-time charge)		\$ 2,550.00
Account Management Fee (Monthly charge)		\$ 1,530.00
Number Fee (Per month and per number)		\$ 170.00
Usage FeeLess than 18 seconds18 seconds and over	and the state of t	\$ 0.12/call \$ 0.20/minute
OTHER FEES		8
Mobility/Change Charges (Per number)		\$ 425.00
Maintenance Fee (Monthly charge)		\$10,000.00
There will be no	o volume discounts and none of the fees ar	e subject to waiver.

A security deposit may be required.

Sincerely,

Sara Meinhard Counsel